

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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(Admitted *pro hac vice*)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Hearing Date and Time:

Pursuant to OST

DECLARATION OF DAVID S. TORBORG

I, David S. Torborg, hereby declare under penalty of perjury:

1. I am a partner of the law firm of Jones Day, and my office is located at 51 Louisiana Avenue, N.W., Washington, D.C. 20001. I am a member in good standing of the Bar of the District of Columbia. My application to appear pro hac vice in this case has been granted by this Court. There are no disciplinary proceedings pending against me.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

2. I submit this declaration in connection with the *Debtor's Motion to Compel the Official Committee of Talc Claimants to Supplement Certain of Its Responses to Interrogatories and Requests for Production* filed contemporaneously herewith. I have personal knowledge of the matters set forth herein.

3. Pursuant to Local Bankruptcy Rule 7037-1, on the 23rd day of May 2023, counsel for the Debtor conferred with counsel to the TCC regarding the relief requested in the *Motion to Compel*. Counsel for the TCC indicated that it opposed the requested relief.

4. Attached hereto as **Exhibit A** is a true and correct copy of *Debtor's First Set of Interrogatories to the Official Committee of Talc Claimants*.

5. Attached hereto as **Exhibit B** is a true and correct copy of *Debtor's First Set of Requests for Production of Documents to the Official Committee of Talc Claimants*.

6. Attached hereto as **Exhibit C** is a true and correct copy of the TCC's *Responses and Objections to the Debtor's First Set of Interrogatories to the Official Committee of Talc Claimants*.

7. Attached hereto as **Exhibit D** is a true and correct copy of the TCC's *Responses and Objections to the Debtor's First Set of Requests for Production of Documents to the Official Committee of Talc Claimants*.

8. Attached hereto as **Exhibit E** is a true and correct copy of the May 22, 2023 letter from Debtor to the TCC regarding "Deficiencies in The Official Committee of Talc Claimants' Objections and Responses to Debtor's First Set of Interrogatories and Requests for Production."

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 25, 2023
Washington, D.C.

Respectfully submitted,

/s/ David S. Torborg
David S. Torborg